

To: Opalski, Dan[Opalski.Dan@epa.gov]; Soderlund, Dianne[Soderlund.Dianne@epa.gov]; Lidgard, Michael[Lidgard.Michael@epa.gov]
Cc: Owens, Kim[Owens.Kim@epa.gov]; Seyfried, Erin[Seyfried.Erin@epa.gov]; Mayers, Timothy[Mayers.Timothy@epa.gov]
From: Shaw, Hanh
Sent: Wed 8/27/2014 9:19:05 PM
Subject: RE: Conversation with Greg Horner (Shell) re: MCL



The way Greg and I left the conversation was he will get back to me either way. In the meantime, I will articulate our comments and questions for internal review. My plan is to also include TetraTech's technical review comments on the model.

From: Opalski, Dan
Sent: Wednesday, August 27, 2014 1:47 PM
To: Shaw, Hanh; Soderlund, Dianne; Lidgard, Michael
Cc: Owens, Kim; Seyfried, Erin; Mayers, Timothy
Subject: RE: Conversation with Greg Horner (Shell) re: MCL

Thanks, Hanh. Sounds like a good call. Are we moving forward with sending them our MLC comments and questions, or are we waiting on Greg's check back?

From: Shaw, Hanh
Sent: Wednesday, August 27, 2014 1:24 PM
To: Opalski, Dan; Soderlund, Dianne; Lidgard, Michael
Cc: Owens, Kim; Seyfried, Erin; Mayers, Timothy
Subject: Conversation with Greg Horner (Shell) re: MCL

I wanted to let you know about my conversation with Greg Horner this morning. Shell is getting ready to submit the Exploration Plan to BOEM for 2015 drilling in the Chukchi Sea. The EP will include a proposal to use the drill bit technology to construct the mudline cellar. However, it also contains language indicating that if the "ROV" technology is available for use, both in terms of equipment and all necessary permits, then Shell would employ this approach. Shell understands that when they submit the Notices of Intent requesting NPDES coverage under Chukchi general permit, they would have to specify the exact MLC technology.

Shell is interested in having a conversation with EPA about a path forward for the ROV technology. I offered that one approach is for EPA to send Shell its comments and questions on the June white paper and associated model. A meeting, if needed, could occur at a later point. I shared with Greg that we have a heavy work load over the next few months to finalize the Geotechnical General Permit.

Greg will get back to me once he has the chance to consult with Susan Childs. More to come – stay tuned.

Hanh